

REMARKS

To further prosecution of the present application, Applicant has amended herein Claims 27-31, 33-36, 40-41, 43-49, 54, and 59-61, and has cancelled herein Claims 62-63. The amendments to the Claims have been made to clarify the respective inventions recited therein. The foregoing amendments do not add subject matter and have antecedent basis. Applicant respectfully requests reconsideration.

In addition, Applicant has added herein to the present application new Claims 64-72 with Claims 64, 66, and 68 in independent form.

Rejection of Claims 62 and 63 Under 35 U.S.C. § 112

The Examiner has rejected Claims 62 and 63 under 35 U.S.C. § 112, first paragraph, as containing subject matter that is not described in the specification in such a way to reasonably convey to one skilled in the relevant art that the inventor has possession of the claimed invention at the time the application was filed. More specifically, the Examiner has indicated that newly added dependent Claims 62 and 63 recite new matter and therefore are rejected. Applicant has cancelled herein Claims 62 and 63 and respectfully requests withdrawal of the rejection.

Rejection of Claims 60, 27-29 and 36 Under 35 U.S.C. § 112

The Examiner has rejected Claims 60, 27-29, and 36 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. The Examiner has indicated that these Claims contain the terms “primary life insurance” and “secondary life insurance”, although such claim limitations do not have sufficient antecedent basis. Applicant has amended herein Claims 60, 27-29, and 36 to remove the word “life” from these limitations in order sufficient antecedent basis is provided by the independent claim from which these Claims depend. In addition, Applicant has amended other claims in the present application for the same reasons in order to clarify the invention. Applicant respectfully submits the limitations of Claims 60, 27-29, and 36 now have sufficient antecedent basis and respectfully requests withdrawal of the rejection.

Rejection of Claims 27-30, 36, 44-45, 51-54, and 59-61 Under 35 U.S.C. § 102(e)

Claims 27-30, 36, 44-45, 51-54, and 59-61 have been rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. 5,873,066 issued to Underwood (“Underwood”). Applicant respectfully traverses the rejection of the Claims as being anticipated by Underwood for the reasons given below.

Applicant respectfully submits that independent Claims 59, 60, and 61 are not anticipated by Underwood.

Underwood is directed to a computer-implemented system for an insurance company to underwrite, quote, and bind an excess casualty insurance policy for an insured that has a primary insurance policy with a primary insurance limit amount. (Abstract; col. 2, lines 10-14). A user logs onto a software system (100) and enters into the system information related to an insured, a primary insurance carrier, a primary benefit limit and other information. (col. 2, lines 17-18). In particular, the user would enter a description of the insured’s operation, such as a business operation, and SIC code(s) that is/are associated with the insured’s operation or business. (col. 4, lines 18-20). In addition, SIC code(s) may be entered into the system that identifies a primary carrier name, or multiple carrier names, with whom the insured is associated. (col. 2, lines 15-17; col. 4, lines 18-20; and col. 7, lines 43-46). “SIC” or standard industrial classification codes were originally used for the federal census to identify types of business and commercial operations. Such SIC codes are also used, in at least one other instance, by the U.S. Securities and Exchange Commission to identify a company’s type of business. Attached to this response as Exhibit A is an SIC Code List that is published by the U.S. Securities and Exchange Commission and can be retrieved via the URL [www.sec.gov](http://www.sec.gov). Insurance companies are identified by SIC codes to indicate the type of insurance an insurance company provides. For example, SIC code 6399 refers to “Insurance Carriers, Nec”, and SIC code 6331 refers to “Fire, Marine & Casualty Insurance”, and SIC code 6321 refers to “Accident & Health Insurance”. One or more SIC codes are entered into the system (100) to identify an insured’s type of business or

operation and also to identify the type of insurance carrier in terms of the kind of insurance the carrier provides.

The user then enters into the system (100) the type of insurance coverage and the coverage limit(s) of the primary insurance policy that will underlie the excess casualty insurance policy that the system is determining and may eventually quote and bind. (col. 4, lines 25-27).

In addition, the system retrieves public bureau rating information associated with the primary insurance carrier name that the user entered into the system (100). The system is associated with a database that stores public bureau rating information records, including rating codes that represent the financial stability ratings that are associated with primary insurance carriers. (col. 2, lines 24-29; col. 4, lines 45-47; col. 8, lines 1-7). The system retrieves from the database the public bureau rating information associated with the primary insurance carrier name the user entered into the system. The system then compares the stored rating code to a predetermined minimum financial rating threshold, or, in other words, an acceptable rating level, established by the insurance company quoting the excess insurance policy. (col. 2, lines 29-33; col. 4, lines 41-43 and 48-52; and col. 8, lines 8-12). If, as a result of the comparison, the rating of the primary insurance carrier is below the predetermined threshold or rating level, the system can decline to issue the quotation for the excess policy. (col. 2, lines 33-35; col. 4, lines 52-57; and col. 8, lines 13-15).

The SIC codes are stored in the database in corresponding SIC code records that are linked to underwriting instructions and guidelines which are established and filed by the insurance carrier that is quoting the excess policy. The underwriting instructions and guidelines relate to minimum premiums, hazard rating instructions, underwriting authority and referral criteria corresponding to each SIC code the user might enter into the system. (col. 2, lines 18-24; and col. 5, lines 8-15). The system also includes means for retrieving from the database an SIC code record that corresponds to an SIC code associated with the insured, and for displaying stored hazard rating information that corresponds to the SIC code record. (col. 8, lines 15-18). Such means also displays the hazard rating information to an underwriter of the insurance carrier of the excess policy. (col. 2, lines 37-39).

Applicant respectfully submits Underwood does not disclose each and every element of Claim 59, as required to anticipate the invention recited therein. In addition, Applicant respectfully submits that, in contrast to the invention of Claim 59, Underwood is directed to a system for underwriting, quoting and binding an excess casualty insurance policy that requires the insurance carrier providing the excess policy, or the secondary insurer, to underwrite the excess or secondary policy.

As disclosed in Underwood, the excess casualty policy the computer-implemented system provides includes coverage that is only invoked when the insured's liability exceeds the limit of the underlying primary policy. As discussed in the "Background" section of Underwood, an insured may have a primary insurance policy with a coverage limit of \$10 million, and an excess insurance policy that covers losses in excess of the \$10 million up to some limit, such as, for instance, \$20 million. The excess policy is said to have an "attachment point" of \$10 million because the coverage of the excess policy is not invoked unless the insured's liability exceeds the \$10 million limit covered by the primary policy. (col. 1, lines 24-28 and lines 29-33).

The Underwood system that provides the excess insurance policy is different from and contrasts with the computer-implemented method of Claim 59 and the secondary insurance policy produced therefrom. More particularly, the method of Claim 59 provides additional insurance or a secondary insurance policy that is *independent in effect from and without affect to said primary insurance policy and any benefits of said primary insurance policy . . . creating an obligation of said secondary insurer to pay said secondary benefit amount independent of said primary insurance policy and any benefits of said insurance policy*. Unlike the computer-implemented method of Claim 59 and the secondary insurance policy produced therefrom, the system of Underwood produces an excess casualty policy that is dependent on the liability coverage limit of the primary insurance policy. In addition, the excess casualty policy would only provide benefits in the event the insured's liability is paid under the primary insurance policy and exceeds the primary coverage limit. In other words, Underwood discloses an excess liability policy having attachment points linked to the coverage limit of a primary insurance policy, whereas Claim 59 is directed to a method of providing an additional or secondary insurance policy where the secondary insurance policy is *independent in effect from and*

*without affect to the primary insurance policy. The additional or secondary insurance policy creates an obligation of the secondary insurer to pay the secondary benefit amount independent of the primary insurance policy and any benefits of the primary insurance policy* (or, in other words, is a secondary policy without limitations associated with the payment of the secondary benefit amount). An insured covered under a secondary insurance policy produced via the computer-implemented method of Claim 59 could therefore receive benefits from both the primary insurance policy and the secondary insurance policy in the event of a loss without the coverage limit of the primary policy being paid or exhausted before the payment of the benefit amount provided by the secondary insurance policy. As indicated in the application specification, an object of the invention is to provide additional insurance via a secondary policy to, for instance, increase the total benefit amount available to an insured for a loss that is also covered under a primary policy.

In addition, Claim 59 is directed to a computer-implemented method comprising: *processing and converting said input data into said output data includes determining whether said one or more underwriting standards meets one or more criteria said secondary insurer applies to determine if said secondary insurer can rely upon said underwriting approval of said select primary insurer for said primary insurance policy to provide said secondary insurance policy; and, if said secondary insurer can rely upon said underwriting approval of said primary insurer to provide said secondary insurance policy, generating, as part of said output data, an indication of acceptance of said one or more persons for said secondary insurance policy.*

In other words, the computer-implemented method of Claim 59 determines whether one or more underwriting standards that the primary insurer uses to provide an underwriting approval meets one or more criteria the secondary insurer applies to determine whether it may rely upon the primary insurer's underwriting approval to provide the secondary insurance policy. If the secondary insurer determines it can rely upon the primary insurer's underwriting approval, an indication of acceptance of the one or more persons for the secondary insurance policy is generated. The secondary insurer therefore is not underwriting the secondary insurance policy, but, rather, is relying upon the underwriting approval the primary insurer provides for the primary insurance policy.

Claim 59 embodies another object of the invention to provide additional insurance for a risk without performing an underwriting evaluation, but by relying upon the underwriting approval of a primary insurer for a primary insurance policy and thereby avoiding underwriting costs. As a result, underwriting cost savings are passed on, for instance, to the insureds as reduced premiums for the secondary insurance policies.

In contrast, Underwood discloses a computer-implemented system that uses one or more SIC codes to identify the insured's type of business or operation and to identify the name of the primary insurance carrier in order to retrieve stored SIC code records. The SIC code records are associated with underwriting guidelines and instructions established and filed by the insurance carrier providing the excess or secondary insurance policy that are displayed for an underwriter, indicating the insurance carrier of the excess or secondary insurance policy is performing an underwriting evaluation. (*See*, col. 2, lines 18-22 and lines 37-38). Therefore, in contrast to Claim 59, the disclosed Underwood system requires the insurance carrier providing the excess (or secondary) insurance policy to perform an underwriting evaluation.

Further, in contrast to Claim 59, the Underwood system uses public bureau ratings that represent the financial stability of primary insurance carriers in order for the excess insurance carrier to compare such ratings with its predetermined rating level or threshold to determine whether to decline to provide quotations for excess policies. If the Underwood system determines a primary insurance carrier falls below the predetermined rating or threshold, a quotation for an excess policy is declined. In the Office Action, the Examiner appears to relate this disclosure of Underwood to the limitation of the previously presented Claim 59 that was directed to *determining whether said one or more underwriting standards [of said primary insurer] meets one or more criteria said secondary insurer applies to determine if said secondary insurer can rely upon said underwriting evaluation of said select primary insurer performed for said primary insurance policy to determine the eligibility of said one or more persons for said secondary insurance policy*. However, Applicant respectfully submits that, as recited in amended Claim 59, determining whether underwriting standards of a primary insurer meets one or more criteria a secondary insurer applies to determine if it can rely upon the underwriting approval of the primary insurer for the primary insurance policy to provide

the secondary insurance policy is not a comparison of the financial rating of a primary insurance carrier with a predetermined rating or threshold a second insurance carrier uses to determine the financial stability of the primary insurance carrier. Such a comparison involves determining the financial stability of the primary insurance carrier and not determining whether the secondary insurance carrier can rely on the underwriting approval of the primary insurance carrier. Applicant respectfully submits that the excess policy system of Underwood would necessarily rely upon the financial stability of the primary insurance carrier, to pay the primary coverage limit of the primary policy, in order for the excess insurance carrier to underwrite an excess policy to provide coverage in excess of the primary coverage limit (or after the primary policy benefit is paid). Claim 59 is directed to providing additional insurance as a secondary insurance policy that creates an obligation of the secondary insurer to pay a secondary benefit amount independent of any benefits of the primary insurance policy.

Applicant respectfully submits the computer-implemented method of Claim 59 and the system of Underwood are patentably distinct and produce different secondary insurance policies. In addition, Applicant respectfully submits that the computer-implemented method of Claim 59 relies upon the underwriting approval of the primary insurer for the secondary insurer to provide the secondary policy, while the system of Underwood relies upon the underwriting the secondary insurer performs using the secondary insurer's established underwriting instructions and guidelines to provide the secondary policy.

Thus, Underwood does not teach each and every element of Claim 59 and thereby does not anticipate the invention recited therein. Accordingly, Applicant respectfully submits Claim 59 is patentably distinct from Underwood and respectfully requests withdrawal of the rejection of Claim 59 under § 102(e).

Claims 27-49 depend from Claim 59 and are patentable for at least the reasons given above. The rejection of Claims 27-49 therefore should be withdrawn.

Similarly, with respect to independent Claims 60 and 61, Applicant respectfully submits, for the same reasons given above, Claims 60 and 61 are not anticipated by Underwood. Underwood does not teach each and every element of Claims 60 and 61.

In particular, for the reasons given above with respect to Claim 59, Underwood does not teach at least the limitation of the insurance system of Claim 60 directed to *said broker computer being programmed to determine whether one or more underwriting standards, said select primary insurer uses to provide said underwriting approval, meets one or more criteria said secondary insurer applies to determine if said secondary insurer may rely upon said primary insurer's underwriting approval to provide said secondary insurance policy; and said broker computer being programmed to generate, as part of said output data, an indication of acceptance of said one or more persons for said secondary insurance policy, if said secondary insurer determines it may rely upon said underwriting approval of said primary insurer.*

Similarly, for the reasons given above with respect to claim 59, Underwood does not teach at least the limitation of the method of Claim 61 directed to *determining whether said one or more underwriting standards said primary insurer uses meets one or more criteria a secondary insurer applies to determine whether said secondary insurer can rely on said primary insurer's underwriting approval, of said one or more persons for said first insurance policy, to provide said second insurance policy; and, if said secondary insurer can rely on said primary insurer's underwriting approval of said one or more persons for said first insurance policy, providing information to define said second insurance policy.*

In addition, as discussed above with respect to the secondary insurance policy produced via the computer-implemented method of Claim 59, the secondary and second insurance policy produced via the insurance system of Claim 60 and the method of Claim 61, respectively, creates *an obligation of said secondary insurer to pay said secondary benefit amount independent of said primary, or first, insurance policy and any benefits of said primary, or first, insurance policy.* Further, with respect to Claim 61, the secondary insurance policy is *independent in effect from and without affect to said first insurance policy.*

Thus, Underwood does not teach each and every element of Claims 60 and 61 and thereby does not anticipate the inventions recited therein. Accordingly, Applicant respectfully submits Claims 60 and 61 are patentably distinct from Underwood and respectfully requests withdrawal of the rejection of Claims 60 and 61 under § 102(e).

Claims 51-54 depend from Claim 60 and are patentable for at least the reasons given above. The rejection of Claims 51-54 therefore should be withdrawn.

Rejection of Claims 31-36, 37-43, 46-47, 48-49 and 62-63 Under 35 U.S.C. § 103(a)

Claims 31, 62, and 63 have been rejected under 37 U.S.C. § 103(a) as being unpatentable over Underwood. Claims 32-35, 37-43, and 46-47 have been rejected under 37 U.S.C. § 103(a) as being unpatentable over Underwood as applied to Claims 59 and 36 above and further in view of Ryan. Claims 48 and 49 have been rejected under 37 U.S.C. § 103(a) as being unpatentable over Underwood as applied to Claim 59 and further in view of Pescitelli. Claims 62-63 have been cancelled herein. Applicant respectfully traverses all rejections of these Claims under 35 U.S.C. § 103(a).

With respect to independent Claim 59, Underwood, alone or in the cited combination with Ryan or Pescitelli, does not achieve the invention recited in Claim 59 for at least the reasons given upon with respect to Underwood. In addition, Applicant respectfully submits that neither Underwood, alone or in the cited combination with Ryan or Pescitelli, provides a teaching or suggestion that would motivate one of ordinary skill in the art to modify the excess insurance system of Underwood to achieve the invention of Claim 59.

Thus, Applicants respectfully submit that Claim 59 is not obvious in view of Underwood, alone or in combination with Ryan or Pescitelli. Accordingly, Applicant respectfully requests withdrawal of the rejections of Claim 59 as noted above.

Claims 31-35, 37-43, 46-47, and 48-49 depend from Claim 59 and are patentable for at least the same reasons given above. Withdrawal of the rejection of these Claims is therefore respectfully requested.

Patentability of New Claims 64-72

New Claims 64-72 include independent Claims 64, 66, and 68. New Claims 64-72 are patentable over the prior art of record because such prior art does not anticipate nor render obvious the inventions recited therein.

The prior art of record does not disclose the computer-implemented method of Claim 64 and, in particular, does not disclose, nor teach or suggest, at least the limitations

directed to: *providing a computer configured for receiving input data and for processing and converting said input data into output data for defining, in part, said secondary insurance policy, said secondary insurance policy being independent in effect from and without affect to said primary insurance policy and any benefits provided under said primary insurance policy; and processing and converting said input data into said output data includes determining whether said primary insurer is a select primary insurer, said select primary insurer being an insurer said secondary insurer believes uses an acceptable underwriting evaluation, and determining whether said select primary insurer provided underwriting approval of said one or more persons for said primary insurance policy; and if said primary insurer provided underwriting approval of said one or more persons for said primary insurance policy, generating, as part of said output data, said secondary insurance policy.*

The prior art of record does not disclose, nor provide any teaching or suggestion of, at least the limitations to determining whether the primary insurer is a select primary insurer that the secondary insurer believes uses an acceptable underwriting evaluation, and to determining whether said select primary insurer provided underwriting approval of said one or more persons for said primary insurance policy to generate the secondary insurance policy. In other words, the prior art does not disclose, teach or suggest the secondary insurer relies on whether or not the select primary insurer has given an underwriting approval of the one or more persons for the primary insurance policy to generate the secondary insurance policy.

For similar reasons, the prior art of record does not disclose the method recited in independent Claim 66. More specifically, the prior art of record does not disclose, nor teach or suggest, at least the limitations to *determining whether said prior insurer provided an underwriting approval of said one or more persons for said previously issued insurance policy; and, if said prior insurer provided said underwriting approval of said one or more persons for said previously issued insurance policy, determining whether said prior insurer is a select prior insurer, said select prior insurer designated by an additional insurer as using acceptable underwriting standards; and, if said prior insurer is a select prior insurer, providing without underwriting said additional or replacement insurance policy to provide additional insurance.*

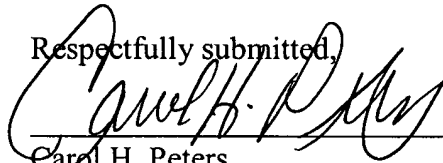
In addition, the prior art of record does not disclose, nor teach or suggest, at least the limitations of independent Claim 68 directed to *determining whether said prior insurer provided an underwriting approval of said one or more persons for said previously issued insurance policy*; and, *if said prior insurer provided said underwriting approval of said one or more persons for said previously issued insurance policy, determining whether said prior insurer is a select prior insurer, said select prior insurer designated by an additional insurer as using acceptable underwriting standards*; and, *if said prior insurer is a select prior insurer, providing said additional insurance policy to provide said one or more persons with additional insurance to cover said specified risk*.

Furthermore, the prior art of record does not disclose, teach or suggest the secondary or second insurance policy *being independent in effect from and without affect to said primary [or previously issued] insurance policy*, and *providing at least one benefit amount for said one or more persons independent of said primary [or previously issued] insurance policy and any benefits of said primary [or previously] insurance policy*, as required by Claims 64, 66, and 68.

Thus, for the foregoing reasons, Applicant respectfully submits the new Claims 64-72 are patentably distinct from the prior art of record.

Based upon the foregoing amendments and discussion, the present application is believed to be in condition for allowance and a notice to this effect is respectfully requested. Should the Examiner have any questions concerning this response, she is invited to telephone the undersigned.

Respectfully submitted,



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## U.S. Securities and Exchange Commission

### Division of Corporation Finance: Standard Industrial Classification (SIC) Code List

The Standard Industrial Classification Codes that appear in a company's disseminated [EDGAR filings](#) indicate the company's type of business. These codes are also used in the [Division of Corporation Finance](#) as a basis for assigning review responsibility for the company's filings. For example, a company whose business was Metal Mining (SIC 1000) would have its filings reviewed by staffers in A/D Office 4.

SIC Code	A/D Office	Industry Title
100	4	Agricultural Production-Crops
200	4	Agricultural Prod-Livestock & Animal Specialties
700	4	Agricultural Services
800	4	Forestry
900	4	Fishing, Hunting and Trapping
1000	4	Metal Mining
1040	4	Gold and Silver Ores
1090	4	Miscellaneous Metal Ores
1221	4	Bituminous Coal & Lignite Mining
1311	4	Crude Petroleum & Natural Gas
1381	4	Drilling Oil & Gas Wells
1382	4	Oil & Gas Field Exploration Services
1389	4	Oil & Gas Field Services, NEC
1400	4	Mining & Quarrying of Nonmetallic Minerals (No Fuels)
1520	6	General Bldg Contractors - Residential Bldgs
1531	6	Operative Builders
1540	6	General Bldg Contractors - Nonresidential Bldgs
1600	6	Heavy Construction Other Than Bldg Const - Contractors
1623	6	Water, Sewer, Pipeline, Comm & Power Line Construction
1700	6	Construction - Special Trade Contractors

1731	6	Electrical Work
2000	4	Food and Kindred Products
2011	4	Meat Packing Plants
2013	4	Sausages & Other Prepared Meat Products
2015	4	Poultry Slaughtering and Processing
2020	4	Dairy Products
2024	4	Ice Cream & Frozen Desserts
2030	4	Canned, Frozen & Preservd Fruit, Veg & Food Specialties
2033	4	Canned, Fruits, Veg, Preserves, Jams & Jellies
2040	4	Grain Mill Products
2050	4	Bakery Products
2052	4	Cookies & Crackers
2060	4	Sugar & Confectionery Products
2070	4	Fats & Oils
2080	2	Beverages
2082	2	Malt Beverages
2086	2	Bottled & Canned Soft Drinks & Carbonated Waters
2090	4	Miscellaneous Food Preparations & Kindred Products
2092	4	Prepared Fresh or Frozen Fish & Seafoods
2100	4	Tobacco Products
2111	4	Cigarettes
2200	2	Textile Mill Products
2211	2	Broadwoven Fabric Mills, Cotton
2221	2	Broadwoven Fabric Mills, Man Made Fiber & Silk
2250	2	Knitting Mills
2253	2	Knit Outerwear Mills
2273	2	Carpets & Rugs
2300	2	Apparel & Other Finishd Prods of Fabrics & Similar Matl
2320	2	Men's & Boys' Furnishgs, Work Clothg, & Allied Garments
2330	2	Women's, Misses', and Juniors Outerwear
2340	2	Women's, Misses', Children's & Infants' Undergarments
2390	2	Miscellaneous Fabricated Textile Products
2400	6	Lumber & Wood Products (No Furniture)
2421	6	Sawmills & Planting Mills, General
2430	6	Millwood, Veneer, Plywood, & Structural Wood Members
2451	6	Mobile Homes
2452	6	Prefabricated Wood Bldgs & Components

2510	6	Household Furniture
2511	6	Wood Household Furniture, (No Upholstered)
2520	6	Office Furniture
2522	6	Office Furniture (No Wood)
2531	6	Public Bldg & Related Furniture
2540	6	Partitions, Shelvg, Lockers, & of fice & Store Fixtures
2590	6	Miscellaneous Furniture & Fixtures
2600	4	Papers & Allied Products
2611	4	Pulp Mills
2621	4	Paper Mills
2631	4	Paperboard Mills
2650	4	Paperboard Containers & Boxes
2670	4	Converted Paper & Paperboard Prods (No Contaners/Boxes)
2673	6	Plastics, Foil & Coated Paper Bags
2711	5	Newspapers: Publishing or Publishing & Printing
2721	5	Periodicals: Publishing or Publishing & Printing
2731	5	Books: Publishing or Publishing & Printing
2732	5	Book Printing
2741	5	Miscellaneous Publishing
2750	5	Commercial Printing
2761	5	Manifold Business Forms
2771	5	Greeting Cards
2780	5	Blankbooks, Looseleaf Binders & Bookbindg & Relatd Work
2790	5	Service Industries For The Printing Trade
2800	6	Chemicals & Allied Products
2810	6	Industrial Inorganic Chemicals
2820	6	Plastic Material, Synth Resin/Rubber, Cellulos (No Glass)
2821	6	Plastic Materials, Synth Resins & Nonvulcan Elastomers
2833	1	Medicinal Chemicals & Botanical Products
2834	1	Pharmaceutical Preparations
2835	1	In Vitro & In Vivo Diagnostic Substances
2836	1	Biological Products, (No Disgnostic Substances)
2840	6	Soap, Detergents, Cleang Preparations, Perfumes, Cosmetics
2842	6	Specialty Cleaning, Polishing and Sanitation Preparations
2844	6	Perfumes, Cosmetics & Other Toilet Preparations
2851	6	Paints, Varnishes, Lacquers, Enamels & Allied Prods

2860	6	Industrial Organic Chemicals
2870	6	Agricultural Chemicals
2890	6	Miscellaneous Chemical Products
2891	6	Adhesives & Sealants
2911	4	Petroleum Refining
2950	6	Asphalt Paving & Roofing Materials
2990	6	Miscellaneous Products of Petroleum & Coal
3011	6	Tires & Inner Tubes
3021	6	Rubber & Plastics Footwear
3050	6	Gaskets, Packg & Sealg Devices & Rubber & Plastics Hose
3060	6	Fabricated Rubber Products, NEC
3080	6	Miscellaneous Plastics Products
3081	6	Unsupported Plastics Film & Sheet
3086	6	Plastics Foam Products
3089	6	Plastics Products, NEC
3100	2	Leather & Leather Products
3140	2	Footwear, (No Rubber)
3211	6	Flat Glass
3220	6	Glass & Glassware, Pressed or Blown
3221	6	Glass Containers
3231	6	Glass Products, Made of Purchased Glass
3241	6	Cement, Hydraulic
3250	6	Structural Clay Products
3260	6	Pottery & Related Products
3270	6	Concrete, Gypsum & Plaster Products
3272	6	Concrete Products, Except Block & Brick
3281	6	Cut Stone & Stone Products
3290	6	Abrasive, Asbestos & Misc Nonmetallic Mineral Prods
3310	6	Steel Works, Blast Furnaces & Rolling & Finishing Mills
3312	6	Steel Works, Blast Furnaces & Rolling Mills (Coke Ovens)
3317	6	Steel Pipe & Tubes
3320	6	Iron & Steel Foundries
3330	4	Primary Smelting & Refining of Nonferrous Metals
3334	4	Primary Production of Aluminum
3341	6	Secondary Smelting & Refining of Nonferrous Metals
3350	6	Rolling Drawing & Extruding of Nonferrous Metals
3357	6	Drawing & Insulating of Nonferrous Wire
3360	6	Nonferrous Foundries (Castings)

3390	6	Miscellaneous Primary Metal Products
3411	6	Metal Cans
3412	6	Metal Shipping Barrels, Drums, Kegs & Pails
3420	6	Cutlery, Handtools & General Hardware
3430	6	Heating Equip, Except Elec & Warm Air; & Plumbing Fixtures
3433	6	Heating Equipment, Except Electric & Warm Air Furnaces
3440	6	Fabricated Structural Metal Products
3442	6	Metal Doors, Sash, Frames, Moldings & Trim
3443	6	Fabricated Plate Work (Boiler Shops)
3444	6	Sheet Metal Work
3448	6	Prefabricated Metal Buildings & Components
3451	6	Screw Machine Products
3452	6	Bolts, Nuts, Screws, Rivets & Washers
3460	6	Metal Forgings & Stampings
3470	6	Coating, Engraving & Allied Services
3480	6	Ordnance & Accessories, (No Vehicles/Guided Missiles)
3490	6	Miscellaneous Fabricated Metal Products
3510	10	Engines & Turbines
3523	10	Farm Machinery & Equipment
3524	10	Lawn & Garden Tractors & Home Lawn & Gardens Equip
3530	10	Construction, Mining & Materials Handling Machinery & Equip
3531	10	Construction Machinery & Equip
3532	10	Mining Machinery & Equip (No Oil & Gas Field Mach & Equip)
3533	4	Oil & Gas Field Machinery & Equipment
3537	10	Industrial Trucks, Tractors, Trailors & Stackers
3540	10	Metalworkg Machinery & Equipment
3541	10	Machine Tools, Metal Cutting Types
3550	10	Special Industry Machinery (No Metalworking Machinery)
3555	10	Printing Trades Machinery & Equipment
3559	10	Special Industry Machinery, NEC
3560	10	General Industrial Machinery & Equipment
3561	10	Pumps & Pumping Equipment
3562	6	Ball & Roller Bearings
3564	6	Industrial & Commercial Fans & Blowers & Air Purifying Equip
3567	6	Industrial Process Furnaces & Ovens

3569	6	General Industrial Machinery & Equipment, NEC
3570	3	Computer & of fice Equipment
3571	3	Electronic Computers
3572	3	Computer Storage Devices
3575	3	Computer Terminals
3576	3	Computer Communications Equipment
3577	3	Computer Peripheral Equipment, NEC
3578	3	Calculating & Accounting Machines (No Electronic Computers)
3579	3	Office Machines, NEC
3580	6	Refrigeration & Service Industry Machinery
3585	6	Air-Cond & Warm Air Heatg Equip & Comm & Indl Refrig Equip
3590	6	Misc Industrial & Commercial Machinery & Equipment
3600	10	Electronic & Other Electrical Equipment (No Computer Equip)
3612	10	Power, Distribution & Specialty Transformers
3613	10	Switchgear & Switchboard Apparatus
3620	10	Electrical Industrial Apparatus
3621	10	Motors & Generators
3630	11	Household Appliances
3634	11	Electric Housewares & Fans
3640	10	Electric Lighting & Wiring Equipment
3651	11	Household Audio & Video Equipment
3652	11	Phonograph Records & Prerecorded Audio Tapes & Disks
3661	11	Telephone & Telegraph Apparatus
3663	11	Radio & Tv Broadcasting & Communications Equipment
3669	11	Communications Equipment, NEC
3670	10	Electronic Components & Accessories
3672	10	Printed Circuit Boards
3674	10	Semiconductors & Related Devices
3677	10	Electronic Coils, Transformers & Other Inductors
3678	10	Electronic Connectors
3679	10	Electronic Components, NEC
3690	10	Miscellaneous Electrical Machinery, Equipment & Supplies
3695	11	Magnetic & Optical Recording Media
3711	5	Motor Vehicles & Passenger Car Bodies
3713	5	Truck & Bus Bodies
3714	5	Motor Vehicle Parts & Accessories

3715	5	Truck Trailers
3716	5	Motor Homes
3720	5	Aircraft & Parts
3721	5	Aircraft
3724	5	Aircraft Engines & Engine Parts
3728	5	Aircraft Parts & Auxiliary Equipment, NEC
3730	6	Ship & Boat Building & Repairing
3743	5	Railroad Equipment
3751	5	Motorcycles, Bicycles & Parts
3760	5	Guided Missiles & Space Vehicles & Parts
3790	5	Miscellaneous Transportation Equipment
3812	5	Search, Detection, Navagation, Guidance, Aeronautical Sys
3821	10	Laboratory Apparatus & Furniture
3822	10	Auto Controls For Regulating Residential & Comm'l Environments
3823	10	Industrial Instruments For Measurement, Display, and Control
3824	10	Totalizing Fluid Meters & Counting Devices
3825	10	Instruments For Meas & Testing of Electricity & Elec Signals
3826	10	Laboratory Analytical Instruments
3827	10	Optical Instruments & Lenses
3829	10	Measuring & Controlling Devices, NEC
3841	10	Surgical & Medical Instruments & Apparatus
3842	10	Orthopedic, Prosthetic & Surgical Appliances & Supplies
3843	10	Dental Equipment & Supplies
3844	10	X-Ray Apparatus & Tubes & Related Irradiation Apparatus
3845	10	Electromedical & Electrotherapeutic Apparatus
3851	10	Ophthalmic Goods
3861	10	Photographic Equipment & Supplies
3873	2	Watches, Clocks, Clockwork Operated Devices/Parts
3910	2	Jewelry, Silverware & Plated Ware
3911	2	Jewelry, Precious Metal
3931	5	Musical Instruments
3942	5	Dolls & Stuffed Toys
3944	5	Games, Toys & Children's Vehicles (No Dolls & Bicycles)
3949	5	Sporting & Athletic Goods, NEC
3950	4	Pens, Pencils & Other Artists' Materials

3960	6	Costume Jewelry & Novelties
3990	6	Miscellaneous Manufacturing Industries
4011	5	Railroads, Line-Haul Operating
4013	5	Railroad Switching & Terminal Establishments
4100	5	Local & Suburban Transit & Interurban Hwy Passenger Trans
4210	5	Trucking & Courier Services (No Air)
4213	5	Trucking (No Local)
4220	5	Public Warehousing & Storage
4231	5	Terminal Maintenance Facilities For Motor Freight Transport
4400	5	Water Transportation
4412	5	Deep Sea Foreign Transportation of Freight
4512	5	Air Transportation, Scheduled
4513	5	Air Courier Services
4522	5	Air Transportation, Nonscheduled
4581	5	Airports, Flying Fields & Airport Terminal Services
4610	4	Pipe Lines (No Natural Gas)
4700	5	Transportation Services
4731	5	Arrangement of Transportation of Freight & Cargo
4812	11	Radiotelephone Communications
4813	11	Telephone Communications (No Radiotelephone)
4822	11	Telegraph & Other Message Communications
4832	11	Radio Broadcasting Stations
4833	11	Television Broadcasting Stations
4841	11	Cable & Other Pay Television Services
4899	11	Communications Services, NEC
4900	2	Electric, Gas & Sanitary Services
4911	2	Electric Services
4922	2	Natural Gas Transmission
4923	2	Natural Gas Transmisison & Distribution
4924	2	Natural Gas Distribution
4931	2	Electric & Other Services Combined
4932	2	Gas & Other Services Combined
4941	2	Water Supply
4950	6	Sanitary Services
4953	6	Refuse Systems
4955	6	Hazardous Waste Management
4961	2	Steam & Air-Conditioning Supply
4991	2	Cogeneration Services & Small Power Producers
5000	2	Wholesale-Durable Goods

5010	5	Wholesale-Motor Vehicles & Motor Vehicle Parts & Supplies
5013	5	Wholesale-Motor Vehicle Supplies & New Parts
5020	2	Wholesale-Furniture & Home Furnishings
5030	6	Wholesale-Lumber & Other Construction Materials
5031	6	Wholesale-Lumber, Plywood, Millwork & Wood Panels
5040	2	Wholesale-Professional & Commercial Equipment & Supplies
5045	3	Wholesale-Computers & Peripheral Equipment & Software
5047	1	Wholesale-Medical, Dental & Hospital Equipment & Supplies
5050	4	Wholesale-Metals & Minerals (No Petroleum)
5051	4	Wholesale-Metals Service Centers & of fices
5063	10	Wholesale-Electrical Apparatus & Equipment, Wiring Supplies
5064	10	Wholesale-Electrical Appliances, Tv & Radio Sets
5065	10	Wholesale-Electronic Parts & Equipment, NEC
5070	6	Wholesale-Hardware & Plumbing & Heating Equipment & Supplies
5072	6	Wholesale-Hardware
5080	6	Wholesale-Machinery, Equipment & Supplies
5082	6	Wholesale-Construction & Mining (No Petro) Machinery & Equip
5084	6	Wholesale-Industrial Machinery & Equipment
5090	2	Wholesale-Misc Durable Goods
5094	2	Wholesale-Jewelry, Watches, Precious Stones & Metals
5099	2	Wholesale-Durable Goods, NEC
5110	4	Wholesale-Paper & Paper Products
5122	1	Wholesale-Drugs, Proprietarys & Druggists' Sundries
5130	2	Wholesale-Apparel, Piece Goods & Notions
5140	2	Wholesale-Groceries & Related Products
5141	2	Wholesale-Groceries, General Line
5150	4	Wholesale-Farm Product Raw Materials
5160	6	Wholesale-Chemicals & Allied Products
5171	4	Wholesale-Petroleum Bulk Stations & Terminals
5172	4	Wholesale-Petroleum & Petroleum Products (No Bulk Stations)
5180	2	Wholesale-Beer, Wine & Distilled Alcoholic Beverages
5190	2	Wholesale-Miscellaneous Nondurable Goods
5200	6	Retail-Building Materials, Hardware, Garden Supply
5211	6	Retail-Lumber & Other Building Materials Dealers

5271	2	Retail-Mobile Home Dealers
5311	2	Retail-Department Stores
5331	2	Retail-Variety Stores
5399	2	Retail-Misc General Merchandise Stores
5400	2	Retail-Food Stores
5411	2	Retail-Grocery Stores
5412	2	Retail-Convenience Stores
5500	2	Retail-Auto Dealers & Gasoline Stations
5531	2	Retail-Auto & Home Supply Stores
5600	2	Retail-Apparel & Accessory Stores
5621	2	Retail-Women's Clothing Stores
5651	2	Retail-Family Clothing Stores
5661	2	Retail-Shoe Stores
5700	2	Retail-Home Furniture, Furnishings & Equipment Stores
5712	2	Retail-Furniture Stores
5731	2	Retail-Radio, Tv & Consumer Electronics Stores
5734	2	Retail-Computer & Computer Software Stores
5735	2	Retail-Record & Prerecorded Tape Stores
5810	5	Retail-Eating & Drinking Places
5812	5	Retail-Eating Places
5900	2	Retail-Miscellaneous Retail
5912	1	Retail-Drug Stores and Proprietary Stores
5940	2	Retail-Miscellaneous Shopping Goods Stores
5944	2	Retail-Jewelry Stores
5945	2	Retail-Hobby, Toy & Game Shops
5960	2	Retail-Nonstore Retailers
5961	2	Retail-Catalog & Mail-Order Houses
5990	2	Retail-Retail Stores, NEC
6021	7	National Commercial Banks
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6111	7	Federal & Federally-Sponsored Credit Agencies
6141	7	Personal Credit Institutions
6153	7	Short-Term Business Credit Institutions
6159	7	Miscellaneous Business Credit Institution
6162	7	Mortgage Bankers & Loan Correspondents

6163	7	Loan Brokers
6172	7	Finance Lessors
6189	5	Asset-Backed Securities
6199	7	Finance Services
6200	7	Security & Commodity Brokers, Dealers, Exchanges & Services
6211	7	Security Brokers, Dealers & Flotation Companies
6221	8	Commodity Contracts Brokers & Dealers
6282	7	Investment Advice
6311	1	Life Insurance
6321	1	Accident & Health Insurance
6324	1	Hospital & Medical Service Plans
6331	1	Fire, Marine & Casualty Insurance
6351	1	Surety Insurance
6361	1	Title Insurance
6399	1	Insurance Carriers, NEC
6411	1	Insurance Agents, Brokers & Service
6500	8	Real Estate
6510	8	Real Estate Operators (No Developers) & Lessors
6512	8	Operators of Nonresidential Buildings
6513	8	Operators of Apartment Buildings
6519	8	Lessors of Real Property, NEC
6531	8	Real Estate Agents & Managers (For Others)
6532	8	Real Estate Dealers (For Their Own Account)
6552	8	Land Subdividers & Developers (No Cemeteries)
6770	9	Blank Checks
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6794	4	Patent Owners & Lessors
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6799	7	Investors, NEC
7000	8	Hotels, Rooming Houses, Camps & Other Lodging Places
7011	8	Hotels & Motels
7200	11	Services-Personal Services
7310	11	Services-Advertising
7311	11	Services-Advertising Agencies
7320	11	Services-Consumer Credit Reporting, Collection Agencies
7330	11	Services-Mailing, Reproduction, Commercial Art & Photography

7331	11	Services-Direct Mail Advertising Services
7340	8	Services-To Dwellings & Other Buildings
7350	6	Services-Miscellaneous Equipment Rental & Leasing
7359	6	Services-Equipment Rental & Leasing, NEC
7361	8	Services-Employment Agencies
7363	11	Services-Help Supply Services
7370	3	Services-Computer Programming, Data Processing, Etc.
7371	3	Services-Computer Programming Services
7372	3	Services-Prepackaged Software
7373	3	Services-Computer Integrated Systems Design
7374	3	Services-Computer Processing & Data Preparation
7377	3	Services-Computer Rental & Leasing
7380	11	Services-Miscellaneous Business Services
7381	11	Services-Detective, Guard & Armored Car Services
7384	11	Services-Photofinishing Laboratories
7385	11	Services-Telephone Interconnect Systems
7389	8	Services-Business Services, NEC
7500	5	Services-Automotive Repair, Services & Parking
7510	5	Services-Auto Rental & Leasing (No Drivers)
7600	11	Services-Miscellaneous Repair Services
7812	5	Services-Motion Picture & Video Tape Production
7819	5	Services-Allied To Motion Picture Production
7822	5	Services-Motion Picture & Video Tape Distribution
7829	5	Services-Allied To Motion Picture Distribution
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7841	5	Services-Video Tape Rental
7900	5	Services-Amusement & Recreation Services
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7990	5	Services-Miscellaneous Amusement & Recreation
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8051	11	Services-Skilled Nursing Care Facilities
8060	1	Services-Hospitals
8062	1	Services-General Medical & Surgical Hospitals, NEC
8071	1	Services-Medical Laboratories
8082	1	Services-Home Health Care Services
8090	1	Services-Misc Health & Allied Services, NEC

8093	1	Services-Specialty Outpatient Facilities, NEC
8111	11	Services-Legal Services
8200	11	Services-Educational Services
8300	1	Services-Social Services
8351	1	Services-Child Day Care Services
8600	5	Services-Membership or ganizations
8700	6	Services-Engineering, Accounting, Research, Management
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8731	1	Services-Commercial Physical & Biological Research
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